

1 **SAO**

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Attorneys for Defendant

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TIMOTHY THURTLE,

13 Defendant.

CASE NO.: 2:24-cr-00229-APG-NJK

**STIPULATION TO CONTINUE
MOTION DEADLINES AND TRIAL**

(SECOND REQUEST)

14 **IT IS HEREBY STIPULATED AND AGREED,** by and between
15 JASON FRIERSON, ESQ., Acting United States Attorney, and LAUREN IBANEZ, ESQ.,
16 Assistant United States Attorney, counsel for the United States of America, and
17 ERICK M. FERRAN, ESQ., counsel for Defendant TIMOTHY THURTLE, that the Trial date in
18 the above-captioned matter, currently set for April 21, 2025, at 9:00 a.m., and the calendar call,
19 currently set for April 15, 2025, at 09:00 p.m., be continued for at sixty (60) days or to a time
20 convenient to this Honorable Court.

21 This stipulation is entered into for the following reasons:

- 22 1. Defense Counsel requires additional time to conduct investigation in this case in order
23 to determine whether there are any pretrial issues that must be litigated and whether the
24 case will ultimately go to trial or will be resolved through negotiations.
- 25 2. Defense Counsel and Assistant United States Attorney are currently in negotiations.
- 26 3. Defendant Thurtle is currently on pre-trial release and does not object to the
27 continuance.
- 28 4. All parties involved agree to the continuance.

- 1 5. This is the second request for a continuance of trial.
- 2 6. Denial of this request for continuance would result in a miscarriage of justice.
- 3 7. This request for a continuance is made in good faith and is not intended to delay the
- 4 proceedings in this matter.
- 5 8. The additional time requested by this stipulation is excludable in computing the time
- 6 within which the trial herein must commence pursuant to the Speedy Trial Act, 18
- 7 U.S.C. §§ 3161(h)(7)(A), when considering the factors under 18 U.S.C. §§
- 8 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
- 9 9. For all the above-stated reasons, the ends of justice would be best served by a
- 10 continuance of the trial date.

11 DATED this 24TH day of March 2025.

12
13 /s/ Erick M. Ferran, Esq.
14 ERICK M. FERRAN, ESQ.
15 *Counsel for Defendant Thurtile*

16
17 /s/ Lauren Ibanez, Esq.
18 LAUREN IBANEZ, ESQ.
19 *Assistant United States Attorney*

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 TIMOTHY THURTLE,

7 Defendant.

CASE NO.: 2:24-cr-00229-APG-NJK

ORDER TO CONTINUE TRIAL

8 **FINDINGS OF FACT**

9 Based on the pending Stipulations of the parties, and good cause appearing therefore, the
10 Court finds that:

- 11 1. Defense Counsel requires additional time to conduct investigation in this case in order
12 to determine whether there are any pretrial issues that must be litigated and whether the
13 case will ultimately go to trial or will be resolved through negotiations.
 - 14 2. Defense Counsel and Assistant United States Attorney are currently in negotiations.
 - 15 3. Defendant Thurtle is currently on pre-trial release and does not object to the
16 continuance.
 - 17 4. All parties involved agree to the continuance.
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21 proceedings in this matter.
 - 22 8. The additional time requested by this stipulation is excludable in computing the time
23 within which the trial herein must commence pursuant to the Speedy Trial Act, 18
24 U.S.C. §§ 3161(h)(7)(A), when considering the factors under 18 U.S.C. §§
25 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
 - 26 9. For all the above-stated reasons, the ends of justice would be best served by a
27 continuance of the trial date.
- 28

CONCLUSIONS OF LAW

1. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to prepare for trial effectively and thoroughly taking into account the exercise of due diligence.
2. This request for a continuance is made in good faith and is not intended to delay the proceedings in this matter.
3. The additional time requested by this stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A), when considering the factors under 18 U.S.C. §§ 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
4. For all the above-stated reasons, the ends of justice would be best served by a continuance of the trial date.

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ORDER

IT IS ORDERED that the calendar call scheduled for April 15, 2025, at 9:00 a.m., and the trial currently scheduled for April 21, 2025, at 9:00 a.m., are continued.

IT IS FURTHER ORDERED that the Calendar Call in this matter be scheduled for the ____ day of _____, at ____ am/pm.

IT IS FURTHER ORDERED that the Trial in this matter be scheduled for the ____ day of _____, at ____ am/pm.

IT IS FURTHER ORDERED by and between the parties herein, the deadlines for filing any and all motions are hereby due on or before the ____ day of _____, 2025.

IT IS FURTHER ORDERED that the deadlines for filing of responsive pleadings, are hereby due on before the ____ day of _____, 2025.

IT IS FURTHER ORDERED that the deadlines for filing any and all replies to dispositive motions are hereby due on or before the ____ day of _____, 2025.

DATED this ____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE